

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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<b>In re:</b>	§	
	§	<b>Chapter 11</b>
<b>NORTHSTAR OFFSHORE GROUP, LLC</b>	§	
	§	<b>Case No. 16-34028</b>
<b>Putative Debtor.</b>	§	

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**JOINT EMERGENCY MOTION TO CONTINUE THE HEARING ON THE LIFT STAY  
MOTION FILED BY THE STATE OF LOUISIANA, THROUGH THE OFFICE OF  
MINERAL RESOURCES, DEPARTMENT OF NATURAL RESOURCES SCHEDULED  
FOR NOVEMBER 4, 2016 AT 9:00 A.M. CST**

(Relates to Docket Nos. 50, 53)

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN TWENTY FOUR DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

TO THE HONORABLE U.S. BANKRUPTCY COURT:

Northstar Offshore Group, LLC (“Northstar”), Putative Debtor in the above-captioned case, and the State of Louisiana (“the State”), through the Office of Mineral Resources, Department of Natural Resources (together with Northstar, the “Parties”) submit this joint motion to continue (the “Motion to Continue”) the hearing currently scheduled for November 4, 2016 at 9:00 a.m. CST and respectfully represents as follows:

1. On August 12, 2016, Alliance Offshore, LLC, Alliance Energy Services, LLC, and Montco Oilfield Contractors, LLC filed an involuntary chapter 11 petition [Dkt. No. 1] against Northstar.

2. Pursuant to the Case Management Order entered in the above-captioned case, there is a hearing on the involuntary petition, and whether to grant or deny involuntary relief set for November 30, 2016 at 9:00 a.m. CST. *See* Dkt. No. 45.

3. On October 17, 2016, the State filed a Motion for Relief From the Automatic Stay (the “Stay Relief Motion”) [Dkt. No. 50] in order to exercise its regulatory rights to conduct an audit on Northstar. The State scheduled a hearing on the Stay Relief Motion for November 10, 2016 at 1:30 p.m. CST.

4. On October 20, 2016, the Court entered an order resetting the hearing on the Stay Relief Motion for November 4, 2016 at 9:00 a.m. CST. [Dkt. No. 53].

5. The Parties have conferred and have agreed that it is in the best interests of both parties for the hearing on the Stay Relief Motion to be reset to a date that is after the hearing on the involuntary petition. Northstar believes that prior to the November 30, 2016 hearing, its resources are best allocated to the negotiations and settlements with its creditors. In addition, pursuant to the Case Management Order, discovery on the involuntary petition will commence on

November 7, 2016. Further, the Parties believe that, if the Court grants involuntary relief, that they will be able to negotiate a resolution of the Lift Stay Motion.

6. Therefore, by this Motion, the Parties request entry of an order continuing the hearing on the Lift Stay Motion from November 4, 2016 to a date that is after the November 30, 2016 hearing on whether to grant or deny involuntary relief for Northstar.

7. Emergency consideration of the Motion to Continue is necessary as the objection deadline for the Stay Relief Motion is two days from the date of this filing (October 28, 2016) and the hearing on the Stay Relief Motion is currently scheduled for nine days from the date of this filing (November 4, 2016).

WHEREFORE, the Parties respectfully request that the Court enter an order, the form of which is attached hereto as Exhibit A, granting this Motion to Continue, continuing the hearing on the Lift Stay Motion to a date that is after the November 30, 2016 hearing and granting all other relief that is appropriate under the circumstances.

Dated: October 27, 2016

Respectfully submitted,  
/s/ Lydia T. Protopapas  
Lydia T. Protopapas  
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*Counsel for the State of Louisiana, through  
the Office of Mineral Resources,  
Department of Natural Resources*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served by electronic transmission to all registered ECF users appearing in this case on October 27, 2016.

/s/ Lydia T. Protopapas  
Lydia T. Protopapas

**IN THE UNITED STATES BANKRUPTCY COURT  
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<b>In re:</b>  <b>NORTHSTAR OFFSHORE GROUP, LLC</b>  <b>Putative Debtor.</b>	§ § § § §	<b>Chapter 11</b>  <b>Case No. 16-34028</b>
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**ORDER CONTINUING HEARING ON THE LIFT STAY MOTION FILED BY THE  
STATE OF LOUISIANA, THROUGH THE OFFICE OF MINERAL RESOURCES,  
DEPARTMENT OF NATURAL RESOURCES SCHEDULED FOR NOVEMBER 4, 2016  
AT 9:00 A.M. CST**

The Court has considered the *Joint Emergency Motion to Continue the Hearing on the Lift Stay Motion Filed by the State of Louisiana, Through the Office of Mineral Resources, Department of Natural Resources Scheduled for November 4, 2016 at 9:00 a.m. CST* (the “Motion to Continue”). The Court hereby GRANTS the Motion to Continue, and further ORDERS that the Lift Stay Motion<sup>1</sup> is RESCHEDULED to \_\_\_\_\_ at \_\_\_\_\_ a.m / p.m.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge Marvin Isgur  
United States Bankruptcy Judge

\_\_\_\_\_  
<sup>1</sup> Defined terms shall have the meaning ascribed to such terms in the Motion to Continue.